

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

MDL NO. 1456
Civil Action No. 01-12257-PBS

THIS DOCUMENT RELATES TO:

GOVERNMENT EMPLOYEES
HOSPITAL ASSOCIATION, individually
and on behalf of all others similarly
situated,

Plaintiff

v.

SERONO INTERNATIONAL, S.A.,
SERONO LABORATORIES, INC.,
SERONO, INC., RJL SYSTEMS, INC.,
and RUDOLPH J. LIEDTKE

Defendants.

STIPULATION OF EXTENSION OF TIME TO RESPOND TO AMENDED COMPLAINT

IT IS HEREBY STIPULATED AND AGREED by and between defendant Serono International, S.A., Serono Laboratories, Inc., and Serono, Inc. (collectively the “Serono Defendants”) and plaintiff Government Employees Hospital Association, on behalf of themselves and all others similarly situated, as follows:

1. The Serono Defendants shall answer, move, or otherwise respond to the Amended Complaint on or before February 24, 2006.
2. Plaintiff shall file its opposition to any responsive motion on or before April 7, 2006.
3. The Serono Defendants shall reply to any opposition on or before April 28, 2006.

Respectfully submitted:

GOVERNMENT EMPLOYEES HOSPITAL
ASSOCIATION, on behalf of themselves and
all others similarly situated,

By their attorneys,

/s/ David S. Nalven (by agreement)

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Dated: January 3, 2006

SERONO INTERNATIONAL, S.A.,
SERONO, Inc., and SERONO
LABORATORIES, INC.

By their attorneys,

/s/ David M. Ryan

Fred A. Kelly (BBO No. 544046)
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CERTIFICATE OF SERVICE

I, David M. Ryan, do hereby certify that I caused a copy of the foregoing Stipulation to
be served by electronic means, upon all counsel of record, on this 3rd day of January, 2006.

David M. Ryan

David M. Ryan